

U.S. Department of Justice

*United States Attorney
Southern District of New York*

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February 4, 2025

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MEMO ENDORSED

By ECF

The Honorable Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Conklin, et al. v. United States Postal Service*, 23 Civ. 7122 (SHS)

Dear Judge Parker:

This Office represents the United States Postal Service (the “Government”), defendant in the above-referenced action brought pursuant to the Fair Labor Standards Act, 29 U.S.C. § 207. By Order dated November 12, 2024, the Court scheduled a settlement conference for February 18, 2025, with pre-conference submissions due no later than February 11, 2025. ECF 53.

With plaintiffs’ consent, the Government respectfully requests a 60-day adjournment of the settlement conference and the pre-conference submissions. If granted, the settlement conference would be rescheduled to April 21, 2025, or any date thereafter that would be convenient for the Court, and the pre-conference submissions would be due on or before April 14, 2025, or a later date determined by the Court. The reason for this request is that the agency is still compiling relevant data for the members of the collective, and given the number of plaintiffs who have opted into this litigation, the agency requires additional time than it had anticipated. In addition, once the agency has compiled and produced the relevant data to plaintiffs’ counsel, the parties will need time to review the records, address any potential issues with the data, and analyze the data to finalize their settlement positions. The agency believes that an additional 60 days is necessary to complete those tasks.

This is the Government’s first request for an adjournment of the settlement conference. I thank the Court for its consideration of this request.

Respectfully,

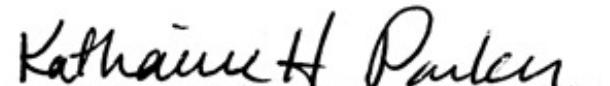
DANIELLE SASSOON
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Southern District of New York

By: /s/ Ilan Stein
ILAN STEIN
Assistant United States Attorney for the
Southern District of New York
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cc: Plaintiffs' counsel (via ECF)

APPLICATION GRANTED: The settlement conference in this matter scheduled for Tuesday, February 18, 2025 at 10:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Tuesday, April 22, 2025 at 10:00 a.m. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than April 15, 2025 by 5:00 p.m.

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

02/05/2025